

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:

MONICA LAFRANCES ALTAMURA,
Debtor

Chapter 7

Case No. 1-20-bk-00774-HWV

REGENTS GLEN COMMUNITY
ASSOCIATION
AND
STONEGATE AT REGENTS GLEN
HOMEOWNERS ASSOCIATION,
Movants

v.

MONICA LAFRANCES ALTAMURA,
Respondent

OBJECTION OF REGENTS GLEN COMMUNITY ASSOCIATION AND
STONEGATE AT REGENTS GLEN HOMEOWNERS ASSOCIATION
TO CONFIRMATION OF CHAPTER 13 PLAN

COME NOW, this 15th day of June, 2020, Regents Glen Community Association and Stonegate at Regents Glen Homeowners Association, by and through their attorneys, CGA Law Firm P.C., E. Haley Rohrbaugh, Esquire, and respectfully represents the following:

PARTIES

1. The first Movant is Regents Glen Community Association (hereinafter "Regents Glen"). Regents Glen is represented by CGA Law Firm, E. Haley Rohrbaugh, Esquire, 135 North George Street, York, Pennsylvania 17401.

2. The second Movant is Stonegate at Regents Glen Homeowners Association (hereinafter "Stonegate"). Stonegate is represented by CGA Law Firm, E. Haley Rohrbaugh, Esquire, 135 North George Street, York, Pennsylvania 17401. Regents Glen and Stonegate are hereinafter collectively referred to as "Movants."

{01783670/1}

3. The Respondent is the within Debtor, Monica Lafrances Altamura (hereinafter "Debtor"). Debtor is represented by Pugh and Cutaia, PLLC, Dawn M. Cutaia, Esquire, 115 East Philadelphia Street, York, Pennsylvania 17401.

4. Charles J. DeHart, III Esquire (hereinafter "Trustee"), has been duly appointed and qualified to act as the Trustee in the within bankruptcy case and maintains an office at 8125 Adams Drive, Suite A, Hummelstown, Pennsylvania 17036.

BACKGROUND

5. Debtor filed the within case as a voluntary Chapter 13 on February 29, 2020.

6. At all relevant times, Debtor has been the real owner of a tract or parcel of land with buildings and other improvements thereon located at 959 Brechin Lane, York, Pennsylvania 17403. Additionally, at all relevant times, Debtor has been a member of Regents Glen and Stonegate.

7. As a member, the Debtor is required to pay monthly Common Expense assessments to Regents Glen in the amount of \$150.00 as well as monthly Common Expense assessments to Stonegate in the amount of \$240.00.

8. Movants, as a homeowners associations, utilize these monthly Common Expense assessments to pay the costs associated with maintenance of the common areas and public use areas (parking areas, walkways, etc.)

OBJECTION

9. Movants object to the Debtor's Chapter 13 Plan for the following reasons:

a. Regents Glen filed Proof of Claim #6 on May 8, 2020 in the amount of \$5,274.05, \$2,387.24 of which is secured by Debtor's real estate;

{01783670/1}

b. Stonegate filed Proof of Claim #7 on May 8, 2020 in the amount of \$4,941.70, \$3,241.70 of which is secured by Debtor's real estate;

c. Debtor's Chapter 13 Plan does not provide for the full amount of Movants' secured claims.

WHEREFORE, Regents Glen Community Association and Stonegate at Regents Glen Homeowners Association respectfully request that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,

CGA Law Firm P.C.

/s/E. Haley Rohrbaugh, Esquire

E. Haley Rohrbaugh, Esquire

Sup. Ct. I.D. No. 323803

135 North George Street

York, PA 17401

(717) 848-4900

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:

MONICA LAFRANCES ALTAMURA,
Debtor

Chapter 7

Case No. 1-20-bk-00774-HWV

REGENTS GLEN COMMUNITY
ASSOCIATION
AND
STONEGATE AT REGENTS GLEN
HOMEOWNERS ASSOCIATION,
Movants

v.

MONICA LAFRANCES ALTAMURA,
Respondent

CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on June 15, 2020, a true and correct copy of the attached Objection was served upon the following parties in the following manner:

Name	Mode of Service
Charles J. DeHart, III, Chapter 13 Trustee	Via CM/ECF
Dawn M. Cutaia, Esquire	Via CM/ECF

I certify under penalty of perjury that the forgoing is true and correct.

Dated: 06/15/2020

/s/E. Haley Rohrbaugh, Esquire
E. Haley Rohrbaugh, Esquire

{01783670/1}